UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
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December 10, 1996

Mr. Philip Otis
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: Comments on the Draft Fact Sheets for the Proposed Remedial Action Plan (PRAP) for Sites 6, 10 & 11 at the former Naval Construction Battalion Center, RI

Dear Mr. Otis:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA) the Environmental Protection Agency (EPA) has reviewed the above referenced documents.

In Figure 2 the Navy has outlined Site 10 boundaries with the inclusion of the range berm, does the Navy propose to change the boundaries to include the berm in this site? It has always been EPA's understanding that Site 10 only includes the three disposal areas behind the berm.

These fact sheets are full of very dry factual information. While we agree all of this information needs to be presented it may help increase the community participation at this site if the fact sheets are more alive. I have enclose some more eye catching examples from our Community Relations Office. We would be happy to work with the Navy to develop a more reader friendly fact sheet. Please contact me at (617) 573-5736 to discuss these issues.

Sincerely,

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Enclosures

cc: Richard Gottlieb, RIDEM
Walter Davis, CSO
Bob DiBiccaro, EPA
Sarah White, EPA

00328

Fall 1996 Number 4

ENVIRONMENTAL REPORT

U.S. ARMY SOLDIER SYSTEMS COMMAND • NATICK LABS • NATICK, MASSACHUSETTS

Technical Assistance Grant Awarded

The Lakewood Association, an incorporated group of U.S. Army Soldier Systems Command (SSCOM) neighbors, has been awarded a Technical Assistance Grant (TAG) from the U.S. Environmental Protection Agency (EPA).

This $50,000 grant provides funding to the local group to hire an independent advisor to assist in better understanding the technical reports and results from the environmental work. It ensures the community an objective opinion about the procedures and studies taking place, as well as guidance and advice in the cleanup process.

"The EPA recognizes that it's important for the community to have an independent source of information," said Dr. Charles Czeisler, president of the Lakewood Association.

Dr. Czeisler has been attending Restoration Advisory Board (RAB) meetings as an observer. At its September 11 meeting, he was named as a member of the RAB. He will continue to represent the concerns of the Lakewood Association.

Mr. Kevin Palaia collects sediment samples at the shoreline of Lake Cochichuate for risk assessment activities (see article on page 2).

Plans for Work at Former Gym Site

A Work Plan outlining the field investigation for the 1.6-acre former Proposed Gymnasium Site and the inactive SSCOM Water Supply Well Site is currently being developed. The study area for the gymnasium site is a filled-in marsh that was used in the 1970s as a helicopter landing area and as a testing area for bladders (synthetic rubber containers used to hold fluids). In the 1980s, this site was chosen for SSCOM's new gymnasium. However, construction was halted when petroleum-type odors were encountered during initial construction work.

The field investigation will focus on assessing the conditions in soil and underground water at each location. Soil, surface water, and sediment samples will be collected for analysis. Monitoring wells will also be installed to assess the underground water. A human health and ecological risk assessment will be completed at each site (see article on page 2).

The Work Plan should be finalized by the end of 1996. ABB Environmental Services, Inc. (ABB) has been assigned by the Army to conduct this work. Based in Portland, Maine, with an office in Wakefield, Massachusetts, ABB has conducted similar investigations at Fort Devens, Sudbury Annex, and other military installations in the Northeast.

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Risk Assessments Now Being Conducted

In the coming month, the Army will be assessing the human health and ecological risks posed by the dissolved solvents found at the Warehouse Area. To prepare these assessments, the Army will rely on the vast amounts of data that have been collected during the Phase I and Phase II Remedial Investigations. These risk assessments will address surface soil, subsurface soil, underground water, and lake water and sediments.

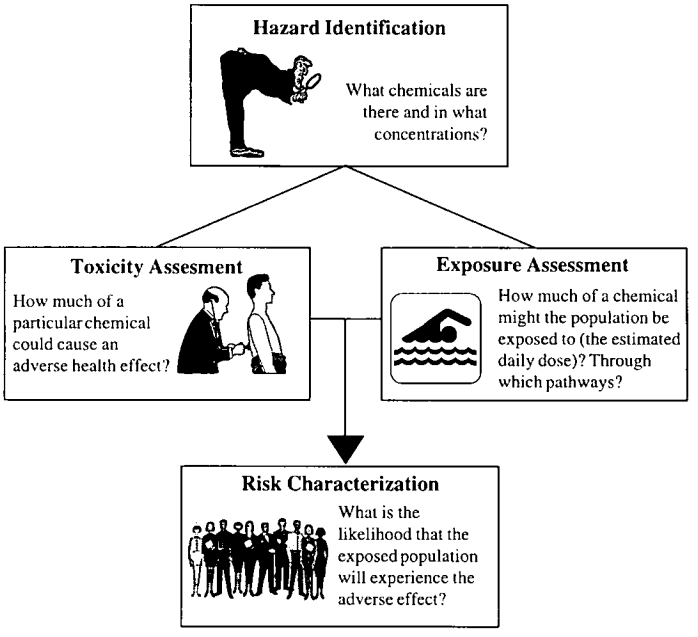
In the future, the Army will also complete human health and ecological risk assessments for the former Proposed Gymnasium Site and the inactive SSCOM Water Well Supply Site (see article on page 1).

Scientists use risk assessments to evaluate a site's potential adverse effects on human health and the environment. They use a range of scenarios to calculate potential risk to people, animals, and plants.

During the human health risk assessment, human exposure pathways for site solvents are studied. Exposure pathways are ways in which people could come in contact with a potential health hazard. Potential exposure pathways for people could include the following:

- Touching, accidentally swallowing, or breathing windblown surface soil while playing on the ballfield
- Touching or accidentally swallowing subsurface soil or breathing windblown subsurface soil during potential future construction activities
- Touching or accidentally swallowing lake water and/or sediments while at the lake
- Drinking or touching underground water from beneath the Warehouse Area or breathing its vapors while showering during potential future household or industrial uses (**note: this water is not being used for these or any other purposes**).

The Four Steps of Risk Assessment



When conducting a human health risk assessment, a list of chemicals of concern is developed to address the greatest potential risks. They are selected or excluded on the basis of the following:

- A concentration/toxicity value that is found by multiplying maximum detected concentrations by published toxicity values
- Whether they are essential human nutrients at the concentrations detected (for example, iron, magnesium, and potassium)
- Whether they are naturally occurring metals in soils detected at or below levels found in background samples (see related article on page 5)

(Continued on page 3)

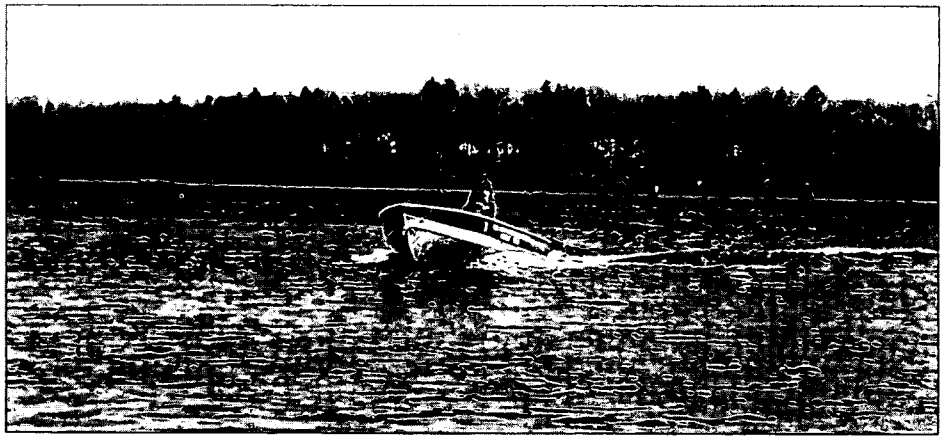
Comparing Warehouse Area Data to Background Levels

When cleaning up an investigated site such as the Warehouse Area, it may be unrealistic, expensive, or impossible to completely remove all chemicals — especially those that occur naturally. Therefore, site remediation may focus on restoring a site so that the soil and water quality is similar to unaffected areas. These "background levels" are determined by collecting and testing samples from locations outside of the area of concern, but close enough to represent typical unaffected conditions.

At any given site, certain naturally occurring compounds such as iron or manganese may be found at elevated concentrations. Some compounds may exist at elevated concentrations due to specific historical activities at a site. For example, it is not unusual to find high concentrations of lead in surface soil surrounding buildings in which lead-based paint was used. Lead concentrations may also be high near heavily traveled roads because of the previous use of leaded gasoline in cars.

Similarly, if a site was used for agriculture, or if a site was sprayed for mosquitoes, elevated concentrations of pesticides could remain in the soil. Polynuclear aromatic hydrocarbons (PAHs) occur naturally in asphalt and fossil fuels such as coal and oil, as well as in the environment as a result of plant synthesis. They can be released into the environment through naturally occurring petroleum seeps or by activities such as asphalt paving, asphalt roofing, and fuel spills. Human activities such as burning coal and wood, and forest or agricultural fires also release PAHs into the environment.

During Phase II of the Remedial Investigation, background locations were selected on Lake Cochituate and in the neighborhoods surrounding SSCOM. Samples were collected to compare with the data from the Warehouse Area. Lake floor features and the type of vegetation found at the Warehouse Area storm water outfall were examined. Then, areas with similar characteristics elsewhere in the lake, and beyond the influence of this outfall, were chosen for sediment and surface water background sampling. Soil background locations were selected in areas similar to the Warehouse Area — baseball fields and streets near SSCOM. The raw data were presented for discussion at the June 27, 1996 RAB meeting. The data are currently undergoing evaluation by the Army.



Surface water samples were collected from Lake Cochituate to determine background levels.

Step Tests Conducted

In September 1996, stepped-rate aquifer tests (or step tests) were conducted at two wells in the Warehouse Area to gather information to refine the design of the Treatability Study. The step test is used to confirm that the pump rates proposed in the Treatability Study are appropriate. The underground water treatment system design may be adjusted based on the conclusions of the step test. Results from two wells tested show that one of the wells, MW-90B-4, is a more likely candidate for use in the Treatability Study. MW-90B-4, located in the Warehouse Area, is a more productive well and draws water from a much wider area than the other tested well.

Answers to Your Questions

What target dates have been established for full-scale treatment to begin?

Robert McLarnon, Natick

The Treatability Study, expected to start next spring, marks the beginning of our cleanup effort. With the information from this study and previous investigations about the underground water beneath the Warehouse Area, treatment alternatives will be evaluated. Target dates cannot be set until alternatives are analyzed, budgetary constraints are considered, and opportunities for comments on the selected alternative have been provided to local, state, and federal regulators and the public.

If possible, please show maps of plumes with direction of travel.

Bernard Saulnier, Natick

Maps of the plumes are available in the Phase I Remedial Investigation (RI) reports located in the Information Repositories (see page 3). It has been determined that the underground water beneath the Warehouse Area flows to the northwest through several types of soil. The various types of soil control the speed and extent of solvent migration. Results from monitoring wells have shown no significant movement of the affected underground water. Data continue to suggest that these substances remain close to the Warehouse Area (see information repositories for data).

At what level is PCE/TCE (tetrachloroethene/trichloroethene) considered hazardous to health?

Jim Carrick, Natick

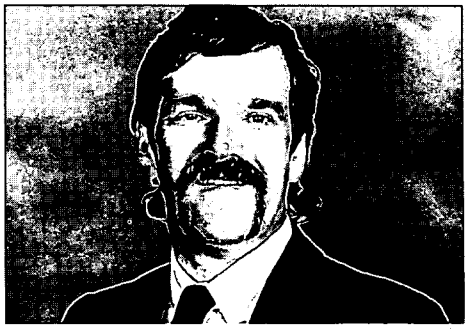
When levels of these solvents test above the Safe Drinking Water Act standard of 5.0 parts per billion (ppb) they are considered hazardous to one's health. However, it is important to remember that although the concentrations of these solvents are above the safe drinking water standards in the Warehouse Area, that water is a resource that is not used as drinking water. The town of Natick monitors the quality of the drinking water to ensure that the water delivered to Natick homes is safe.

Would stopping the source of contamination allow the ground to somewhat clean itself? I hope we use good sense on the cleanup and don't break the bank.

H. Barbieri, Natick

The source of contamination has yet to be discovered despite a highly extensive underground water investigation program. Based upon the data collected to date, we believe that the source is no longer active and that what we are studying is residual. Allowing the ground water to slowly clean itself is one remedial option that will be considered before the final remedy is selected. That option is called natural attenuation where, over time, microbes that live in the soil break down the solvents into stable compounds such as carbon dioxide and water.

Our goal is to find the best and most efficient method of cleanup, document this in the Record of Decision (ROD), prepare the Remedial Design (a description of the technical specifications for the cleanup), and begin the Remedial Action (the actual cleanup) as soon as the regulatory requirements are met.



Mr. John J. McHugh, an environmental engineer, is SSCOM's Project Officer for Environmental Restoration. He is happy to answer your questions.

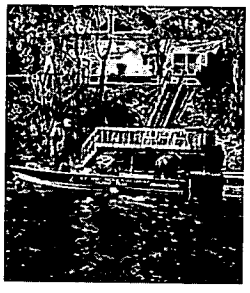
"Answers to Your Questions" is a regular feature of the SSCOM Environmental Report. *Questions are selected from inquiries sent by newsletter reply cards (included with each issue), telephone calls, electronic mail, facsimiles, and letters sent to us from community residents. (See "How to Contact Us" on page 3.)*

Keep Your Questions Coming!

It is our goal to keep the public informed. We appreciate and encourage your questions, comments, and suggestions.

(Risk Assessments continued from page 2)

- Whether they occur at a much greater concentration in quality control samples
- Frequency of detection
- Comparison to regulatory agencies' standards for drinking water and surface water



Risk assessments do have some limitations and uncertainties. They depend on the accuracy of the data collected, and the accuracy and availability of published toxicity information for both humans and the environment. Risk assessments also depend on assumptions about how exposure might happen, how diseases are caused, and how people and organisms behave. They do not address how combinations of chemicals may increase or decrease health or ecological risks.

Risk assessments may also make incorrect assumptions about current or future land use. However, these uncertainties are accounted for using conservative assumptions that are likely to protect the most sensitive human or ecological populations.

Treatability Study Update

In an effort to respond to community concerns and cooperate with the request of local residents, a change to the Treatability Study has been proposed by SSCOM. The purpose of the Treatability Study is to evaluate how well the selected treatment technologies will contain and remove the solvents from the underground water beneath the Warehouse Area.

The Lakewood Association requested that the outfall pipe for the treatment system be changed from the Warehouse outfall to SSCOM's main outfall. With approval from the EPA and the Massachusetts Department of Environmental Protection (MADEP), this change is being made in the design.

One or more extraction wells will be used to pump the affected underground water from below the Warehouse Area. This water is then purified by air stripping and carbon adsorption equipment. After passing through the treatment system, the water is sampled to ensure that the solvents were successfully removed.

SSCOM has recently awarded the contract for construction of a building to house the Treatability Study equipment. Completion of the building and installation of the equipment is anticipated for early spring 1997.

How to Contact Us

SSCOM
Susan Aninger (508) 233-5340
[saninger@natick-emh2.army.mil]
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[keefe.jerome@epamail.epa.gov]
facsimile: (617) 573-9662

Technical Assistance Grants
Mike McGagh (617) 223-5534

Visit the Information Repositories

The repositories are open to the public and contain major reports and documents related to the cleanup.

Morse Institute
(Reference Section)
17 W. Central St., Natick
(508) 651-7300

Natick Board of Health
Town Hall, 13 Central St., Natick
(508) 651-7244
Ask for Roger Wade

Massachusetts Department of Environmental Protection
Northeast Regional Office
Site Management
10 Commerce Way
Woburn, MA 01801
(617) 932-7600

New RAB Member Needed

A vacancy exists on the Restoration Advisory Board from the Natick School System. Any resident school official, teacher, or parent interested in serving on the RAB should contact Susan Aninger at 233-5340.

Upcoming RAB meetings are scheduled for 7:00 p.m. on November 19, 1996 and January 9, 1997.

These upcoming meetings will be held in the Officers' Club at SSCOM. All RAB meetings are open to the public, and interested community members are invited to attend.

Well Survey Results In

Between July 1995 and May 1996, residents living near SSCOM were surveyed to determine if they have any private supply wells on their property. Of the 620 surveys delivered, 333 responses were received. Only five respondents reported having wells on their property; none of these wells are currently in use. See full report in Information Repositories (page 3).

SSCOM
Environmental Report

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Natick, MA 01760-5049

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Inside This Issue:

A Quarterly Environmental Newsletter

Environmental Update

BRAC Environmental Office, Fort Devens **Number 5, Winter 1996**

Mirror Lake

Drum Removal and Cleanup is Done!

As we have mentioned in previous newsletters, the Army has investigated and initiated cleanup actions at Study Area 17, Mirror Lake, over the last few years. The latest action, drum and debris removal from the lake bottom, was completed in November 1995 with a closure report due in February 1996.

Background: The lake is located in the southeastern portion of the Main Post and used for swimming and recreational fishing. WWII-era grenades were discovered in the lake during a low water period and removed in the 1960s. Six drums were removed in 1990 and fish and sediment samples also collected. Sampling showed no significant contamination. A records review was conducted in 1993 as part of the Site Investigation (SI). In the Fall 1994, a thorough survey of the lake was performed with metal detecting devices and video cameras. More than 40 drums were identified but appeared to be empty. In addition, several ordnance items were identified in shallow water areas. All ordnance was removed and properly disposed of for safety reasons. Samples of surface water and sediments were also collected and showed no significant contamination.

Drum Removal from Mirror Lake

Removal Action: Over the summer the Army addressed appropriate actions at Mirror Lake with the Restoration Advisory Board (RAB). The RAB voiced concerns to the Army about leaving drums and debris at the bottom of Mirror Lake. Working together with the RAB, the Army planned and implemented a removal action on an accelerated schedule so work could be completed before winter. The removal action consisted of the following steps:

- relocate drums or debris previously identified with metal detecting devices;
- dive and inspect areas;
- stage drums and debris onsite; and
- characterize and appropriately dispose of items offsite.

During the diving and inspection portion of the work, if items were suspected to contain hazardous or toxic materials, locations would be flagged and the materials removed later after appropriate measures and plans could be made.

Results: Field work was started in early November 1995 and was completed by the end of the month. In the northeast cove 21 drums or portions of drums were removed. Drums were significantly deteriorated and were empty. In the main portion of the lake an additional 26 drums were removed along with debris and miscellaneous items. A slight oily residue was observed in a few drums. An engine block, fence posts, radiator, and trash cans were examples of the debris removed. No significant source of contamination was identified. In addition, no ordnance was found in the lake. A closure report is due in February 1996.

Answering Your Questions

Over the last year we have received several questions and comments from you about the environmental cleanup activities at Fort Devens. We have addressed many of your questions through *Environmental Update*, fact sheets, and monthly Restoration Advisory Board (RAB) meetings. The blue reply cards that you have sent back to us have been a valuable source of information about *what you want to know*. We want to continue to hear from you. Call Jim Chambers, the BRAC Environmental Coordinator, at (508) 796-3114, ext. 311 or attend a monthly RAB meeting.

Q: Can public meetings be held to learn more about the status of base cleanup?

Yes! Public meetings are held every month through Fort Devens' Restoration Advisory Board. On the first Thursday of each month at 6:00 pm, the RAB meets on the fort at the BRAC Environmental Office on Buena Vista Avenue, Building P-12. RAB meeting agendas are determined by the RAB Co-Chairs, Jim Chambers and Bill Marshall with input from RAB members. Usually, the RAB discusses current activities, issues, and upcoming or planned environmental actions. There is always an open question and answer session at each RAB meeting. Therefore, the RAB is your best way of keeping up with base cleanup activities.

In addition, public hearings are held before the BRAC Cleanup Team selects and implements a cleanup action at a specific site. These hearings allow your voice to be heard and all public comments received are addressed prior to making final cleanup decisions. These hearings, held towards the end of the cleanup process, are not usually well attended by the general public, probably for a number of different reasons. To keep up-to-date on our activities and to be part of the environmental cleanup at Fort Devens as it happens, RAB meetings are your best bet!

Q: How is water quality being protected during the redevelopment of Fort Devens?

As part of the Reuse Planning Process, a Water Resources Protection Report was prepared for the Massachusetts Government Land Bank and the surrounding communities. The report develops a comprehensive management framework that protects ground and surface waters while allowing active redevelopment of Fort Devens. This report, issued in November 1994 is a good source of information on the areas' water resources, geology and hydrology, existing water supplies and protection measures currently in place. The report explores additional protective measures and future water supply development. In addition, the Water Resources Protection Plan is included to ensure the protection of our vital surface and groundwater resources in the area. Protective provisions of the plan have been incorporated into the zoning bylaws. Inquiries about the report may be directed to the Devens Commerce Center, formerly the Reuse Center, at (508) 772-6340.

Feasibility
A Detailed Engineering An

? *What is a Feasibility Study?*

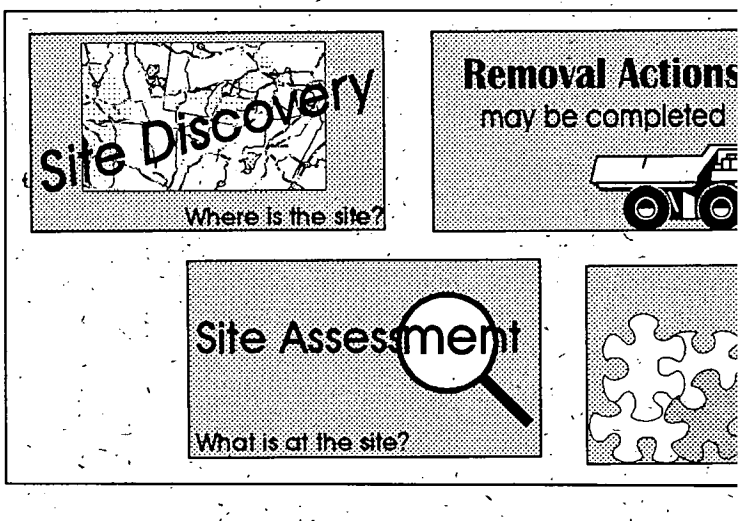
After all the field work and preliminary investigations have been completed at a site, it is time to look at <u>all</u> the data that has been collected and determine how each area should be cleaned up. The Feasibility Study is one of the final steps in the cleanup process. Usually it is conducted concurrently with the Remedial Investigation (see our last issue for more information about this step). The **Feasibility Study** identifies cleanup objectives, and develops, screens, and evaluates potential cleanup technologies. Each identified cleanup action and technology is compared against a specific set of evaluation criteria to determine which method would be the best one for site cleanup.

? *How does a Feasibility Study get done?*

➢ The Superfund program, which is guiding the cleanup at Fort Devens, emphasizes permanent cleanup technologies that reduce contaminant toxicity, mobility, or volume rather than technologies aimed solely at preventing exposure to contaminants. Cleanup objectives are developed that identify contaminants, media of interest (e.g., groundwater, soil, sediment), and exposure pathways (how the contaminants may impact humans or the environment). Response actions are developed for <u>each</u> affected media, so one set of alternatives may be examined for groundwater cleanup at a site, and another set of alternatives may be examined for soil cleanup.

➢ Potential cleanup methods are identified for each affected media at the site. These responses usually include actions such as containment, excavation, extraction, treatment, and/or disposal. A "No Action" alternative is always included in the evaluation.

➢ For each affected medium, an estimate of the volume or areas for cleanup is determined. This step helps engineers evaluate how long each technology will take to



Studies
lysis of Cleanup Options

implement and how much it will cost. This eliminates technically unfeasible alternatives.

➢ Technologically-feasible cleanup alternatives are then evaluated against the following seven criteria:

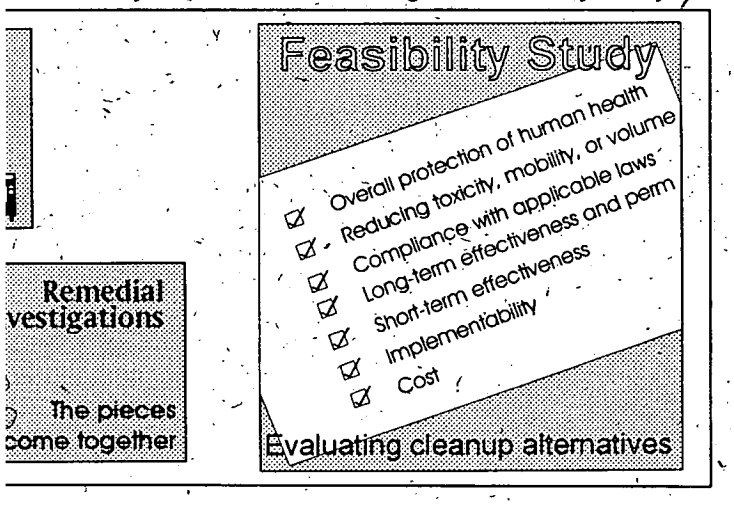
- overall protection of human health and the environment
- reducing toxicity, mobility, or volume of contaminants
- compliance with applicable laws and regulations
- long-term effectiveness and permanence
- short-term effectiveness
- implementability
- cost

? *When is the public involved?*

State approval and community acceptance are two additional criteria that are evaluated for each alternative. Public input plays an important role in selecting a cleanup alternative. Public comments received on a draft Feasibility Study are incorporated into the final version.

The Feasibility Study provides the basis for selecting a preferred cleanup alternative, which is described in a **Proposed Plan**. This document is also available for public comments and must be approved by both State and Federal regulators before cleanup can begin. After a public comment period (typically 30 days), the Proposed Plan is accepted or revised based on comments received. The final cleanup decision is then documented in a **Record of Decision**, known as a ROD. In this process the public can comment twice on cleanup alternatives at a site; once on the Feasibility Study and once on the Proposed Plan. All public comments are addressed in the Responsiveness Summary that is part of the ROD. The Fort Devens' RAB is an important forum for discussing cleanup alternatives with the public and facilitates your participation in our environmental decision-making process. Get involved and attend one of our monthly RAB meetings.

Environmental Cleanup; step by step. Detailed engineering analysis is conducted during the Feasibility Study



An Ongoing Feasibility Study

A Feasibility Study is one of the final steps in the cleanup process. At Fort Devens, 22 Feasibility Studies have been finished or are ongoing; two Proposed Plans are complete; and two RODs have been signed.

Feasibility Studies for several sites will be available for public comment in the coming months. Looking at one of these sites, Area of Contamination (AOC) 43G, will help in understanding what the Feasibility Study is all about. AOC 43G is a former gas station. Old, leaking gasoline storage tanks have been removed, but soil contaminated with gasoline and oil products is affecting the groundwater under the site. The Army will be removing the contaminated soil this summer, which will remove the source of the groundwater contamination. The Feasibility Study examines the affected groundwater and how it should be cleaned up. At this time, four alternatives are being evaluated in the Feasibility Study:

- No action;
- Bioremediation, which relies on natural organisms or bacteria to break down petroleum contaminants;
- Pumping and treating groundwater at the source of the contamination and allowing natural degradation to decompose chemicals in the associated groundwater plume; and
- Pumping and treating groundwater, as in the alternative above, but adding oxygen to the plume to help the chemicals decompose.

When the draft Feasibility Study is complete, it will be made available to the public for comment. We hope you will take advantage of the process and let your voice be heard.

Q: What is the status of the environmental investigations at Moore Airfield?

There are four sites being evaluated at the former Moore Airfield. They are: Study Area (SA) 30, Drum Storage Area; SA 31, Fire Fighting Training Area; SA 47, Building 3816, Leaking Underground Storage Tank; and AOC 50, WWII Fuel Points.

At SAs 30, 31, and 47 significant contamination has not been found. No Further Action (NFA) decision documents have been signed for SAs 31 (January 1995) and 47 (June 1994), and approval of a NFA decision is pending at SA 30. AOC 50 requires further evaluation and cleanup. Soil and groundwater are contaminated with petroleum products from underground storage tanks and tetrachloroethane from past parachute cleaning operations in the area. Work at the site has progressed in phases. As part of Phase I, three underground storage tanks were removed in January 1993. Phase II includes the ongoing removal action for tetrachloroethane in the soil. A soil vapor extraction system was installed in early 1994 to remove air and contaminants from the soil. This treatment process is ongoing and is done "in place" without disturbing the soil. A Remedial Investigation (RI) is the next step and planning activities are underway. The RI and FS reports are expected in late summer 1996.

For More Information ...

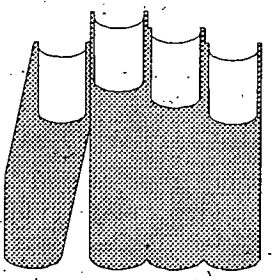
If you have any questions or comments about the environmental restoration activities at Fort Devens, please let us know!

- Contact Jim Chambers
  BRAC Environmental Coordinator
  508-796-3114, extension 311, or

- Contact a community member of the Restoration Advisory Board:

Bill Marshall	508-772-3306
Heidi Roddis	617-259-9500
Rev. Phil Goff	508-772-2044

RAB meetings are held on the first Thursday of each month. Contact the BRAC Environmental Office for specific information.



Documents relating to the environmental cleanup and restoration program at Fort Devens are available for public review at convenient locations.

Information repositories have been established at:

Ayer Public Library
26 E. Main Street
Ayer, MA
508-772-2257

Harvard Public Library
Fairbank Street
Harvard, MA
508-456-4114

Lancaster Public Library
Main Street
Lancaster, MA
508-368-8928

Hazen Memorial Library
6 Lancaster Road
Shirley, MA
508-425-2620

The Davis Library at Fort Devens recently closed. By appointment, environmental documents may be reviewed at the BRAC Environmental Office.

BRAC Environmental Coordinator
U.S. Army - Fort Devens
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Fort Devens, MA 01433

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